

Danning Jiang, Esq. (CA BAR No. 196985)
LAW OFFICES OF DANNING JIANG
271 North First Street
San Jose, California 95113
Tel.: (408) 299-0800
Fax: (408) 299-0300
E-mail: djiang@jianglawgroup.com

Attorneys for Defendant Francis Yuen and
Relief Defendant Laurata Chan

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

EADGEAR, INC., EADGEAR HOLDINGS
LIMITED, CHARLES S. WANG, FRANCIS
Y. YUEN, AND QIAN CATHY ZHANG,

Defendants,

LAURATA P. CHAN,

Relief Defendant.

Case No.: 3:14-cv-04294-RS

STIPULATION AND ~~PROPOSED~~ ORDER
AMENDING ORDER GRANTING
PRELIMINARY INJUNCTION

Date:

Time:

Courtroom: 3, 17th Floor

Judge: Hon. Richard Seeborg

STIPULATION AND ~~PROPOSED~~ ORDER

Plaintiff Securities and Exchange Commission, Defendants eAdGear, Inc., eAdGear Holdings Limited, Charles Wang, Qian Cathy Zhang, Francis Yuen, and Laurata Chan (collectively the "Parties"), by and through their counsel of record, state as follows:

WHEREAS, Plaintiff filed this action on September 24, 2014 [Dkt. No. 1], seeking a temporary restraining order and a Preliminary Injunction that would, among other things, enjoin

Defendants from engaging in specified conduct, freeze the assets of Defendants and specified assets of the Relief Defendant, and require repatriation of assets [Dkt. No. 3];

WHEREAS, on December 8, 2014, this Court entered the Order Granting Preliminary Injunction [Dkt. No. 58];

WHEREAS, further on December 8, 2014, this Court entered the Amended Order Granting Preliminary Injunction (the "Amended Preliminary Injunction Order") [Dkt. No. 60], in which the Court granted defendants, Francis Yuen and Laurata Chan, monthly living expenses and periodical tax payments from their Wells Fargo Bank account number XXX-XXX8183;

WHEREAS, subsequently, Wells Fargo Bank has encountered problems in freezing and unfreezing the XXX-XXX8183 bank account; and

WHEREAS, counsel for defendants Francis Yuen and Laurata Chan has met and conferred with counsel for Plaintiff Securities and Exchange Commission and counsel for Wells Fargo Bank;

NOW THEREFORE, the Parties, by and through their counsel of record, stipulate to further amend the Amended Preliminary Injunction Order as following:

The Amended Preliminary Injunction Order shall be further amended as the attached [PROPOSED] SECOND AMENDED ORDER GRANTING PRELIMINARY INJUNCTION.

DATED: March 5, 2015

KERR & WAGSTAFFE LLP

By /s/ ADRIAN SAWYER
ADRIAN SAWYER
Attorneys for Defendants
EADGEAR, INC.
EADGEAR HOLDING LIMITED

DATED: March 3, 2015

WOLF, PENNELLA & STEVENS, LLP

By /s/ PAUL WOLF
PAUL WOLF
Attorneys for Defendants
CHARLES S. WANG
QIAN CATHY ZHANG

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2 DATED: March 2, 2015

LAW OFFICES OF DANNING JIANG

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4 /s/ DANNING JIANG
DANNING JIANG
Attorneys for Defendants
Francis Yuen and Laurata Chan


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7 DATED: March 2, 2015

8 By /s/ SUSAN F. LAMARCA
9 SUSAN F. LAMARCA
Attorneys for Plaintiffs
10 SECURITIES AND EXCHANGE COMMISSION
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13 **ORDER**

14 PURSUANT TO THE PARTIES' STIPULATION, IT IS SO ORDERED.
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17 Dated: 3/13, 2015

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HONORABLE RICHARD CEEBORG
UNITED STATES DISTRICT JUDGE
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